

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

AIC, INC. et al.,

Defendants,

and

**ALLIED BEACON PARTNERS, INC. (f/k/a
Waterford Investor Services, Inc.) et al.,**

Relief Defendants.

No. 3:11-cv-00176

**OPENING BRIEF IN SUPPORT OF
PLAINTIFF'S RENEWED MOTION TO COMPEL DISCOVERY**

Federal Rule of Civil Procedure 37 “establishes the mechanisms by which Rules 26 to 36 can be made effective.” 8B Charles Alan Wright et al., Federal Practice and Procedure § 2281 (3d ed. 2013). Here, the Court has already ordered the AIC Defendants and the Relief Defendants to comply with their discovery obligations. (Doc. 85.¹) Simply put, the AIC Defendants and the Relief Defendants should comply with what was previously ordered and take those other reasonable steps previously requested by the Commission and enumerated in this Renewed Motion. (See accompanying motion.)

¹ The term “AIC Defendants” collectively refers to defendants AIC, Inc., Community Bankers Securities, LLC, and Nicholas D. Skaltsounis. The term “Relief Defendants” collectively refers to relief defendants Allied Beacon Partners, Inc. (f/k/a Waterford Investor Services, Inc.), Advent Securities, Inc., and Allied Beacon Wealth Management, LLC (f/k/a CBS Advisors, LLC).

Respectfully submitted,

Dated: May 24, 2013.

s/ Michael J. Rinaldi

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CERTIFICATE OF SERVICE

I hereby certify, this twenty-fourth day of May, 2013, that I served a true and correct copy of the foregoing Opening Brief in Support of Plaintiff's Renewed Motion to Compel Discovery, by the means indicated, upon the following:

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